

II. REMARKS/ARGUMENTS

A. Summary of Amendments

The application still contains 87 claims.

Claims 1, 26 and 73 have been amended in order to clarify their language. These claims have not been amended for reasons related to patentability. No new matter has been added under the current amendment.

Claims 2-25, 27-72 and 73-87 remain the same.

B. Summary of Objection and Response

In the Office Action, the Examiner has objected to claims 73, 86 and 87, because the claims should be rewritten to include other limitations of claims.

Firstly, the Applicant respectfully submits that the Examiner's objection is unclear. The Examiner simply states that the claims should be rewritten to include other limitations of the claims, but does not specify *which* limitations he is referring to. In light of this, the Applicant is not entirely clear as to how to rewrite these claims in order to overcome the Examiner's objection.

Secondly, the Applicant respectfully submits that the Examiner has failed to support his objection with any reference to the United States Patent Act or Rules. As such, it is believed that claims 73, 86 and 87, as they currently stand, are in compliance with the U.S. Patent Act and Rules, and accordingly have not been re-written.

C. Summary of Rejection and Response

In the Office Action, the Examiner has rejected claims 1, 24, 26, 34, 35, 42-50, 73, 86 and 87 under 35 USC §102(b) as being anticipated by U.S. Patent 6,069,895 (hereafter to be referred to as Ayandeh)

For the reasons presented below, the Applicant respectfully traverses the Examiner's rejection, and submits that claims 1, 24, 26, 34, 35, 42-50, 73, 86 and 87 are in allowable form.

Claim 1

The Examiner's attention is respectfully directed towards the following limitations of independent claim 1:

In a router connectable to a plurality of neighbour nodes, the router having a plurality of memory units accessible via separate access paths, a method of processing sets of routing information received from corresponding ones of the neighbour nodes, comprising:

creating a plurality of non-identical routing information subsets from each received set of routing information;

accessing the memory units via the separate access paths; and

storing the plurality of non-identical routing information subsets created from a common set of routing information in respective ones of the plurality of memory units.

The Applicant respectfully submits that the reference cited by the Examiner does not disclose, teach or suggest the above-emphasized limitations of independent claim 1. More specifically, Ayandeh does not disclose "creating a plurality of *non-identical routing information subsets* from each received set of routing information". Nor does Ayandeh disclose "storing the plurality of *non-identical routing information subsets*...in respective ones of the plurality of memory units".

Instead, the applicant respectfully submits that all of the routing tables in the intelligent line cards 48 in Ayandeh's Network Route Server 40 are copies of the

routing tables within the central controller 46. This is most clearly described in column 2 lines 31-40, which states "creating a routing table for the route server ...the route server element periodically *copying* the routing table to an array of packet processing elements...each packet processing element having...memory means for storing the *copy* of the routing table.." and in column 7, lines 62-64, which states "the intelligent line-cards 48 in accordance with the invention accommodate complete *copies* of the routing tables computed by the central controller 46".

Given that Ayandeh discloses *copying* the routing table, and storing the *copy* of the routing table, Ayandeh does not teach "creating a plurality of non-identical routing information subsets" (emphasis added) and "storing the plurality of non-identical routing information subsets ... in respective ones of the plurality of memory units".

The Applicant further submits that in the office action, the Examiner refers to col 1, lines 36-37; col 2, lines 30-32 and col 5, lines 18-21 of Ayandeh as teaching the limitation of "creating a plurality of non-identical routing information subsets from each received set of routing information". Upon review of the portions identified by the Examiner, the Applicant respectfully submits that they simply teach a Route Server Element that creates a routing table of optimal routes for communication through the network. Nowhere do these portions of Ayandeh, or any other portions for that matter, disclose creating a plurality of non-identical routing information subsets from a received set of routing information.

As per §2131 of the MPEP, in order "to anticipate a claim, the reference must teach every element of the claim". Since Ayandeh does not teach every limitation of independent claim 1, Ayandeh. does not support a rejection based on anticipation.

Accordingly, claim 1 is believed to be in allowable form as it currently stands, and the Examiner is respectfully requested to withdraw his rejection of independent claim 1.

Claim 24

Claim 24 depends from independent claim 1 and, as such, incorporates by reference all the claim limitations contained therein, including the above-identified limitations which have already been shown to be absent from Ayandeh. As such, claim 24 is also believed to be in condition for allowance as being dependent upon an allowable base claim. The Examiner is respectfully requested to withdraw his rejection to dependent claim 24.

Claim 26

The Examiner's attention is respectfully directed towards the following limitations of independent claim 26:

A router for use in a communications network, comprising:
a switch fabric having a plurality of communication ports;
a plurality of interfaces, each interface being connected to a corresponding communication port of the switch fabric and connectable to a corresponding neighbour node in the network, each interface being capable of receiving routing information from the corresponding neighbour node;
a plurality of memory units, each accessible via a separate access path; and
a control entity connected to the interfaces and to the plurality of memory units, **the control entity being operable to create a plurality of non-identical routing information subsets from each received set of routing information and to cause the plurality of non-identical routing information subsets created from a common set of routing information to be stored in respective ones of the plurality of memory units.**

For the same reasons as those set forth above with respect to independent claim 1, the Applicant respectfully submits that the reference cited by the Examiner does not disclose, teach or suggest the above-emphasized limitation of independent claim 26. As such, Ayandeh does not anticipate the invention of independent claim 26, as per §2131 of the MPEP.

Accordingly, independent claim 26 is believed to be in allowable form, as it currently stands, and the Examiner is respectfully requested to withdraw his rejection of independent claim 26.

Claim 34, 35, 42-50

Claims 34, 35 and 42-50 depend from independent claim 26 and, as such, incorporate by reference all the claim limitations contained therein, including those which have already been shown to be absent from Ayandeh. Accordingly, claims 34, 35 and 42-50 are now believed to be in condition for allowance as being dependent upon an allowable base claim. The Examiner is respectfully requested to withdraw his rejection of dependent claims 34, 35 and 42-50.

In addition, the Applicant respectfully submits that Ayandeh does not disclose a separate controller card for each table, as is described in dependent claim 44. Nor is there any suggestion in Ayandeh of a plurality of controller cards. Furthermore, Ayandeh clearly calls for a centralized controller that builds the routing tables (col 3, lines 7-19, col 7, lines 2 and 64, col 8, lines 60-61 and col 9, lines 16-17). Accordingly, the Applicant respectfully submits that dependent claim 44 includes further limitations that are not taught or suggested by Ayandeh.

Claim 73

The Examiner's attention is respectfully directed towards the following limitations of independent claim 73:

A method of distributing routing information among a plurality of memory units, the routing information including a plurality of routes, each route having a corresponding property, the method comprising:

associating at least one of the memory units with each route on the basis of said property of that route, **at least one of the plurality of routes being associated with fewer than all of the memory units;**

causing each route to be stored in each of the at least one memory units associated with that route.

The Applicant respectfully submits that the reference cited by the Examiner does not disclose, teach or suggest the above-emphasized limitation of independent claim 1. More specifically, Ayandeh does not disclose "associating at least one of the memory units with each route on the basis of said property of that route" wherein "at least one of the plurality of routes being associated with fewer than all of the memory units".

As described above with respect to independent claim 1, Ayandeh discloses that all the routing tables in the intelligent line cards 48 of the Network Route Server 40 are copies of the routing tables within the central controller 46. Given that these routing tables are simply copies of an already existent routing table, it follows that each intelligent line card 48 in which is stored a routing table contains exactly the same routing information. Accordingly, the Applicant respectfully submits that Ayandeh does not disclose the limitation of "at least one of the plurality of routes being associated with fewer than all of the memory units". As such, Ayandeh does not anticipate the invention of independent claim 73, as per §2131 of the MPEP.

In light of the above, the Applicant respectfully submits that claim 73 is in allowable form as it currently stands. The Examiner is respectfully requested to withdraw his rejection of independent claim 73.

Claims 86-87 (85 and 87)

Although it is indicated in the Office Action that claims 86 and 87 are rejected, the Applicant believes that it was the Examiner's intention to reject claims 85 and 87, instead of claims 86 and 87. Claim 85 depends directly from independent claim 73, which the Examiner has also rejected, while claim 86 depends from claim 82, which the Examiner has identified as containing allowable subject matter. Accordingly, the Applicant will assume that it is claims 85 and 87 that have been rejected, and will address the rejection to these claims below.

Claims 85 and 87 depend from independent claim 73 and, as such, incorporate by reference all the claim limitations contained therein, including those which have already been shown to be absent from Ayandeh. Accordingly, claims 85 and 87 are now believed to be in condition for allowance as being dependent upon an allowable base claim. The Examiner is respectfully requested to withdraw his rejection of dependent claims 85 and 87.

D. Allowable Subject Matter

The Applicant gratefully acknowledges the Examiner's allowance of independent claim 25, as indicated on page 5 of the Office Action.

On page 6 of the Office Action, the Examiner has indicated that claims 2-23, 27-33, 36-41, 51-72 and 74-85 would be allowable if rewritten in independent form including all of the limitations of their base claims and any intervening claims.

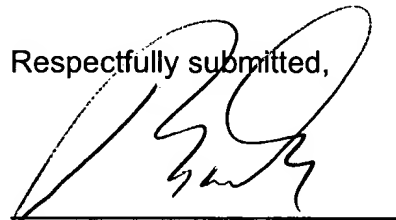
In response, the Applicant respectfully submits that claims 2-23, 27-33, 36-41, 51-72 and 74-85 are each dependent on one of independent claims 1, 26 or 73, which for the reasons presented above, are believed to be in allowable form. Accordingly, the Applicant has chosen not to rewrite these claims in independent form at this time, since they are now believed to be in condition for allowance as being dependent upon an allowable base claim.

V. CONCLUSION

In view of the above, it is respectfully submitted that claims 1-87 are in condition for allowance. Reconsideration of the rejections and objections is requested. Allowance of claims 1-87 at an early date is solicited.

If the claims of the application are not considered to be in full condition for allowance, for any reason, the Applicant respectfully requests the constructive assistance and suggestions of the Examiner in drafting one or more acceptable claims or in making constructive suggestions so that the application can be placed in allowable condition as soon as possible and without the need for further proceedings.

Respectfully submitted,



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